IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	) ) )	03 MDL 1570 (GBD)(FM) ECF Case
This document relates to:		

## **DECLARATION OF ROBERT T. HAEFELE**

I, Robert T. Haefele, state the following:

All Cases

- 1. I am an attorney admitted to practice *pro hac vice* before this Court and an Associate at the firm of Motley Rice LLC, counsel for Plaintiffs in *Burnett, et al. v. Al Baraka Investment & Development Corp., et al.*, Civil Action No. 03 CV 9849. I submit this declaration to provide the Court with the exhibits referenced in the Plaintiffs' Memorandum of Law in Support of Motion for Declaratory Relief dated February 23, 2009.
- 2.Attached are true and accurate copies of Plaintiffs' exhibits identified as follows in the Plaintiffs' Memorandum of Law in Support of Motion for Declaratory Relief dated February 23, 2009:
  - i. Exhibit A the August 15, 2008 letter application from James Kreindler on behalf of the *Ashton* and *Burnett* Plaintiffs to the Honorable Frank Maas, U.S.M.J. and affidavit of Robert T. Haefele dated August 11, 2008 with exhibits 1 through 22;
  - ii. Exhibit B the August 15, 2008 letter application from Sean Carter on behalf of Federal Insurance Plaintiffs to the Honorable Frank Maas, U.S.M.J. with exhibits;
  - iii. Exhibit C the August 15, 2008 letter application from Jerry Goldman, Frank Rubino, Robert Kaplan and Christopher Leonardo on behalf of the *O'Neill, New*

- York Marine, Continental Casualty and Cantor Fitzgerald & Co. Plaintiffs to the Honorable Frank Maas, U.S.M.J. with exhibits A through I;
- iv. Exhibit D the August 25, 2008 letter from Robert Haefele to the Honorable Frank Maas, U.S.M.J.;
- v. Exhibit E the August 27, 2008 letter from Robert Haefele to Sara Normand,
  Assistant U.S. Attorney;
- vi. Exhibit F the August 27, 2008 letter from Sarah Normand to the Honorable Frank Maas, U.S.M.J.;
- vii. Exhibit G the August 26, 2008 letter from Mitchell Berger on behalf of *The National Commercial Bank* to the Honorable Frank Maas, U.S.M.J.;
- viii. Exhibit H the August 27, 2008 letter from Robert Haefele on behalf of the Burnett Plaintiffs to the Honorable Frank Maas, U.S.M.J.;
- ix. Exhibit I the August 28, 2008 letter from Mitchell Berger on behalf of *The National Commercial Bank* to the Honorable Frank Maas, U.S.M.J.;
- x. Exhibit J the September 2, 2008 letter from Robert Haefele on behalf of the
  Burnett Plaintiffs to the Honorable Frank Maas, U.S.M.J., and
- xi. Exhibit K the September 5, 2008 Order of the Honorable Frank Maas, U.S.M.J.(Dkt. No. 2126).

I declare under penalty of perjury that the foregoing is true and correct, based on my knowledge, information and belief.

Executed on February 23, 2009

in Mount Pleasant, South Carolina

Robert T Haefele